

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

Monika Mazurczyk, 037362001
Tomes Law Firm, PC
1 W. Main Street, 3rd Fl.
Freehold NJ 07728
732-333-0681

Attorneys for the Debtor

In Re:
Kevin J. O'Connor

Case No.: 21-13811-MBK

Hearing Date: July 14, 2021 at 10:00 am

Judge: Honorable Michael B. Kaplan
Chapter: 13

CERTIFICATION OF MONIKA MAZURCZYK, ESQ.

IN SUPPORT OF CONFIRMATION OF DEBTOR'S PLAN

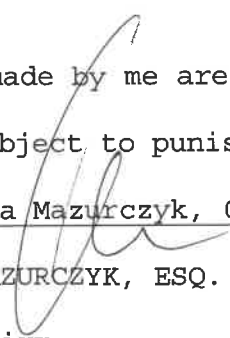
AND IN OPPOSITION TO LINCOLN AUTOMOTIVE FINANCIAL SERVICES'

OBJECTION TO CONFIRMATION

I am MONIKA MAZURCZYK, Attorney for the debtor/s in the above captioned matter, and as such am fully familiar with the facts set forth herein. I make this certification in support of the confirmation of debtor's chapter 13 Plan and in opposition to objection to confirmation by Lincoln Automotive Financial Services, servicer for CAB EAST LLC, lessor of a 2019 Lincoln MKZ (hereinafter referred to as "Lincoln"):

1. Debtor's Modified Plan assumes the lease herein, with all payments to be paid outside the Plan and directly to Lincoln Automotive Financial Services.
2. Debtor was current at the time of filing of the petition and plan.
(see receipt attached).
3. Lincoln is not entitled to attorney fees as a mere telephone call could have produced a copy of the receipt.
4. Therefore, Lincoln's objection should be dismissed and Debtor's Plan should be confirmed.

I hereby certify that the foregoing statements made by me are true, I am aware that if they are found to be willfully false, I am subject to punishment.



/s/Monika Mazurczyk, 037362001

Dated: June 4, 2021

MONIKA MAZURCZYK, ESQ.

For the Firm

5/11/2021

DEBIT

LINCOLN AFS AUTO PYMT

-\$545.00

\$932.33

NO LATE FEE
ON TIME

